



8EHP-94-13294

8895000083 (A)

December 19, 1994

Document Processing Center (TS-790)
Attn: Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

COMPANY SANITIZED

Dear Sir:

Rohm and Haas Company submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act.

This letter transmits preliminary results of a one-generation mallard reproduction study at 0, 100, 300, 600 and 1000 ppm on Rohm and Haas Company exploratory pesticidal candidate ().

While birds in the 600 and 1000 ppm a.i. treatment groups exhibited no treatment related mortalities, overt signs of toxicity or effects on body weight, birds in the 1000 ppm a.i. treatment group showed a slight, statistically significant, treatment related increase in feed consumption during the study. In addition, while not statistically significant, both the 600 and 1000 ppm a.i. treatment groups exhibited increases in the numbers of hens with a regressing ovary at terminal necropsy.

Both the 600 and 1000 ppm a.i. treatment groups showed statistically significant treatment related reductions in egg production. There was also a reduction in egg shell thickness at both the 600 and 1000 ppm a.i. test concentrations, although the difference was statistically significant only at the 1000 ppm a.i. test concentration. In the 1000 ppm a.i. treatment group there was also a slight, but statistically significant, reduction in the mean body weight of hatchlings. Based upon effects noted at the 600 ppm a.i. test concentration (628 ppm a.i. mean measured value), the no observed effect concentration for mallards exposed to () Technical in the diet during this study was 300 ppm a.i. (308 ppm a.i. mean measured value).

The final report will be submitted to EPA when it becomes available. () is the Rohm and Haas experimental designation for (). A diagram of the chemical structure is included in

Attachment I.

2/24/95

SANITIZED

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Page Two

Rohm and Haas has produced only small quantities of these new substances for exploratory testing purposes. Only a very limited number of highly trained laboratory personnel have been involved in the synthesis and testing of the substances. Appropriate safety procedures have been employed to preclude any exposure to new pesticidal candidates whose toxicological properties have not been fully defined. These employees have been advised of the results of these studies.


Because of this very low potential for exposure within the Rohm and Haas Company and the very low probability that these substances are in commerce elsewhere, Rohm and Haas Company does not believe that this exploratory chemical poses any substantial risk to health or the environment.

Rohm and Haas Company considers the exact identity of these chemicals and their Rohm and Haas experimental designation number to be Confidential Business Information (CBI), and thus have enclosed with this letter a sanitized version for the public record with the confidential information deleted. We have also included, as Attachment II, substantiation supporting our CBI claims as required.

Rohm and Haas Company proposes the name "alkylaryl substituted nitrogen compound" as a generic, non-confidential, chemical name to describe the chemical substances discussed in this notice.

If you have any questions concerning this submittal, my telephone number is (215) 592-2986.

Sincerely,


George J. Powell
Senior Regulatory Specialist
Product Integrity Department

GJP:so
Enclosures

RECEIVED
01/1/95
94 DEC 27 AM 10:48

ATTACHMENT I

SANITIZED



Generic name: alkylaryl substituted nitrogen compound



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

George J. Powell
Senior Regulatory Specialist
Product Integrity Department
Rohm & Haas Company
Independence Mall West
Philadelphia, Pennsylvania 19105

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 18 1995

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

Terry R. O'Bryan
Terry R. O'Bryan
Risk Analysis Branch

Enclosure

13294A



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contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: APR 19 1995

NON-CAP

CAP

Submission number: 13294A

TSCA Inventory: Y N D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

NEUR

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.): _____

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

not mammalian study

For Contractor Use Only

entire document: 0 1 2 pages 12 pages 12

Notes:

Contractor reviewer: PM Date: 4/3/95

CECATS/TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA: Submission # 8810 1094 - 13294 (3) SEQ. A
 TYPE: INT SUPP FLWP
 SUBMITTER NAME: Rohm and Haas
Company

INFORMATION REQUESTED: FLWP DATE
 0501 NO INFO REQUESTED
 0502 INFO REQUESTED (TECH)
 0503 INFO REQUESTED (VOL ACTIONS)
 0504 INFO REQUESTED (REPORTING RATIONALE)
 DISPOSITION:
 0630 REFER TO CHEMICAL SCREENING
 0678 CAP NOTICE

VOLUNTARY ACTIONS:
 0401 NO ACTION REPORTED
 0402 STUDIES PLANNED/IN PROGRESS
 0403 NOTIFICATION OF WORKING CONDITIONS
 0404 LABEL/MSDS CHANGES
 0405 PROCESS/ANALYSIS CHANGES
 0406 APPAUSE DISCONTINUED
 0407 PRODUCTION DISCONTINUED
 0408 CONFIDENTIAL

SUB. DATE: 12/19/94 OTS DATE: 12/27/94 CSRAD DATE: 02/24/95

CHEMICAL NAME: Alkylaryl substituted nitrogen compound
Confident

INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C
0201 ONCO (HUMAN)	01 02 04	0216 EPI/CLIN	01 02 04	0241 IMMUNO (ANIMAL)	01 02 04
0202 ONCO (ANIMAL)	01 02 04	0217 HUMAN EXPOS (PROD CONTAM)	01 02 04	0242 IMMUNO (HUMAN)	01 02 04
0203 CELL TRANS (IN VITRO)	01 02 04	0218 HUMAN EXPOS (ACCIDENTAL)	01 02 04	0243 CHEM/PHYS PROP	01 02 04
0204 MUTA (IN VITRO)	01 02 04	0219 HUMAN EXPOS (MONITORING)	01 02 04	0244 CLASTO (IN VITRO)	01 02 04
0205 MUTA (IN VIVO)	01 02 04	0220 ECO/AQUA TOX	01 02 04	0245 CLASTO (ANIMAL)	01 02 04
0206 REPRO/TERATO (HUMAN)	01 02 04	0221 ENV. OCCUR/REL/FATE	01 02 04	0246 CLASTO (HUMAN)	01 02 04
0207 REPRO/TERATO (ANIMAL)	01 02 04	0222 EMER INCI OF ENV CONTAM	01 02 04	0247 DNA DAM/REPAIR	01 02 04
0208 NEURO (HUMAN)	01 02 04	0223 RESPONSE REQUEST DELAY	01 02 04	0248 PROD/USE/PROC	01 02 04
0209 NEURO (ANIMAL)	01 02 04	0224 PROD/COMP/CHEM ID	01 02 04	0251 MSDS	01 02 04
0210 ACUTE TOX. (HUMAN)	01 02 04	0225 REPORTING RATIONALE	01 02 04	0299 OTHER	01 02 04
0211 CHR. TOX. (HUMAN)	01 02 04	0226 CONFIDENTIAL	01 02 04		
0212 ACUTE TOX. (ANIMAL)	01 02 04	0227 ALLERG (HUMAN)	01 02 04		
0213 SUB ACUTE TOX (ANIMAL)	01 02 04	0228 ALLERG (ANIMAL)	01 02 04		
0214 SUB CHRONIC TOX (ANIMAL)	01 02 04	0229 METAB/PHARMACO (ANIMAL)	01 02 04		
0215 CHRONIC TOX (ANIMAL)	01 02 04	0230 METAB/PHARMACO (HUMAN)	01 02 04		

USE: Pesticide

TOXICOLOGICAL CONCERN:

SPECIES: Bird

ONGOING REVIEW

TRIAGE DATA: NON-CBI INVENTORY

YES (DROP/REFER)
 NO (CONTINUE)
 REFTR

CAS SR

IN HUMAN

UNCLASSIFIED Non-Sap